

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**WSOU INVESTMENTS, LLC d/b/a  
BRAZOS LICENSING AND  
DEVELOPMENT**

**Plaintiff,**

**v.**

**F5 NETWORKS, INC.,**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**Civil Action No.: 3:20-cv-00719-JAG**

**STIPULATED MOTION AND  
[PROPOSED] ORDER TO TRANSFER**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) and Defendant F5 Networks, Inc. (“F5 Networks”) (collectively, “Parties”) by and through their respective counsel of record, respectfully submit this Stipulated Motion to transfer this action to the United States District Court for the Western District of Washington.

The Parties hereby stipulate through their respective counsel as follows:

WHEREAS, on September 15, 2020, WSOU filed a Complaint for Patent Infringement against F5 Networks in the above-captioned action (Dkt. 1) (“the Action”);

WHEREAS, on September 16, 2020, the Action was assigned to Judge Gibney in the Richmond Division of the Eastern District of Virginia;

WHEREAS, F5 Networks has not answered or otherwise responded to WSOU’s Complaint for Patent Infringement;

WHEREAS, F5 Networks’s Answer is due on January 5, 2021;

WHEREAS, the Parties stipulate to the transfer of the Action to the United States District Court for the Western District of Washington; and

WHEREAS, the Parties respectfully request the Court grant this Stipulated Motion and transfer the Action to the United States District Court for the Western District of Washington.

IT IS HEREBY STIPULATED AND AGREED, by among the Parties and their respective counsel of record and with the permission of the Court, that the Action be transferred to the United States District Court for the Western District of Washington.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: December 30, 2020

By: /s/ D. Shane Brun  
sbrun@kslaw.com (CA Bar No. 179079)  
(Pro hac vice forthcoming)  
King & Spalding LLP  
601 California Avenue, Suite 100  
Palo Alto, CA 94304  
Telephone: (415) 318-1245

**Attorneys for Defendant  
F5 NETWORKS, INC.**

By: /s/ Isaac P. Rabicoff  
Isaac Philip Rabicoff  
isaac@rabilaw.com  
Rabicoff Law LLC  
5680 King Centre Dr., Suite 654  
Alexandria, VA 22315  
Telephone: (773) 669-4590

Jonathan K. Waldrop (CA Bar No. 297903)  
(Pro hac vice forthcoming)  
jwaldrop@kasowitz.com  
Darcy L. Jones (CA Bar No. 309474)  
(Pro hac vice forthcoming )  
djones@kasowitz.com  
Marcus A. Barber (CA Bar No. 307361)  
(Pro hac vice forthcoming)  
mbarber@kasowitz.com  
John W. Downing (CA Bar No. 252850)  
(Pro hac vice forthcoming)  
jdowning@kasowitz.com  
Heather S. Kim (CA Bar No. 277686)  
(Pro hac vice forthcoming)  
hkim@kasowitz.com  
Jack Shaw (CA Bar No. 309382)  
(Pro hac vice forthcoming)  
jshaw@kasowitz.com  
ThucMinh Nguyen (CA Bar No. 304382)  
(Pro hac vice forthcoming)  
tnguyen@kasowitz.com  
**KASOWITZ BENSON TORRES LLP**  
333 Twin Dolphin Drive, Suite 200  
Redwood Shores, California 94065  
Telephone: (650) 453-5170  
Facsimile: (650) 453-5171

Paul G. Williams (GA Bar No. 764925)  
(Pro hac vice forthcoming)  
pwilliams@kasowitz.com  
**KASOWITZ BENSON TORRES LLP**  
1230 Peachtree Street N.E., Suite 2445  
Atlanta, Georgia 30309  
Telephone: (404) 260-6080  
Facsimile: (404) 260-6081

**Attorneys for WSOU INVESTMENTS,  
LLC d/b/a BRAZOS LICENSING AND  
DEVELOPMENT**

**[PROPOSED] ORDER**

Based on the foregoing, IT IS SO ORDERED that this Action be transferred to the United States District Court for the Western District of Washington. The Court DIRECTS the Clerk to transfer this case to the United States District Court for the Western District of Washington.

DATED: \_\_\_\_\_

---

HON. JOHN A. GIBNEY JR.  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I electronically filed the foregoing with the clerk of court for the United States District Court for the Eastern District of Virginia on this 30th day of December, 2020, using the CM/ECF system, which will send notifications of such filing (NEF) to all CM/ECF registered attorneys on the NEF on this 30th day of December, 2020.

/s/ Isaac P. Rabicoff  
Isaac P. Rabicoff